

LAW OFFICES OF  
**JEFFREY LICHTMAN**  
11 EAST 44<sup>TH</sup> STREET  
SUITE 501  
NEW YORK, NEW YORK 10017  
[www.jeffreylichtman.com](http://www.jeffreylichtman.com)

JEFFREY LICHTMAN  
JEFFREY EINHORN  
JASON GOLDMAN

PH: (212) 581-1001  
FX: (212) 581-4999

December 1, 2021

**BY ECF**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Bahadorifar, et al., 21 CR 430 (SDNY)**

Dear Judge Abrams:

I am writing on behalf of defendant Niloufar Bahadorifar to respectfully request a modification of the defendant's conditions of release which would permit her to travel from her home in California to Nevada to visit with her sister from December 25 through December 27, 2021. The government, by AUSA Matthew Hellman, takes no position on this request and Pretrial Services, by PTSO Alex Lee, has no objection. Should this application be approved by the Court, Ms. Bahadorifar will provide Pretrial Services with a detailed itinerary of her trip.

By way of background, on July 2, 2021, Your Honor released Ms. Bahadorifar on a \$250K personal recognizance bond signed by the defendant and two financially responsible persons, with conditions of release including, *inter alia*, surrender of all travel documents and travel limited to the Central District of California and the Southern District of New York, and location monitoring and a curfew subject to the discretion of Pretrial Services. Since that date, the defendant has remained compliant with her conditions of release.

JEFFREY LICHTMAN

Hon. Ronnie Abrams  
United States District Judge  
December 1, 2021  
Page 2

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

A handwritten signature in black ink, consisting of a long horizontal stroke followed by a stylized 'J' and 'L'.

Jeffrey Lichtman

cc: Matthew Hellman, Esq.  
Jacob Gutwillig, Esq.  
Michael Lockard, Esq. (by ECF)  
Assistant United States Attorneys

Alex Lee (by email)  
Pretrial Services

So Ordered:

A handwritten signature in blue ink, featuring a stylized 'R' and 'A'.

Hon. Ronnie Abrams  
December 2, 2021